

Proposed Juror Questionnaire

for

**In Re: Methyl Tertiary Butyl Ether ("MTBE") Products Liability Litigation
1:00-1898 (SAS) DL 1358**

City of New York v. Amerada Hess Corp., et al.
(No. 04-CIV-3417)

Introduction and Instructions

THE TRIAL WILL BEGIN on July __, 2009

In order to speed up the process of jury selection, a juror questionnaire has been prepared for you to complete.

The questionnaire is designed to obtain information about your background as it relates to your possible service as a juror in this case. Its use will avoid the necessity of asking each prospective juror every one of these questions in open court, thereby substantially shortening the jury selection process.

All information contained in this questionnaire will be kept confidential. It will be reviewed only by the Court and by the attorneys on each side. The parties in the case may also review the questionnaires.

Respond to each question as fully and completely as possible. Your complete candor and honesty is necessary so that both the plaintiff and the defendant will have a meaningful opportunity to select an appropriate jury. Your cooperation is of vital importance.

Because the questionnaire is part of the jury selection process, the questionnaires are to be answered by you under your oath as a prospective juror and you are required to tell the truth. You are instructed **not** to discuss this case or the questionnaire with anyone, including your family, friends, co-workers and fellow jurors. **You must complete the questionnaire yourself without consulting, talking to or seeking assistance from anyone.**

If you require additional space for your response or wish to make further comments regarding any of your answers, please use the additional blank lines on the final page of this questionnaire. Please identify by number the question you are responding to on the blank page.

Please keep in mind that there are no *ōrightō* or *ōwrongō* answers. Your answers will assist the Court and the parties in selecting an appropriate jury.

Please fill out the entire questionnaire. Do not leave any questions blank. If you are unable to answer a question or do not understand the question, please answer *ōdo not knowō* or *ōdo not understandō* in the space after the question.

Juror Questionnaire
In Re: Methyl Tertiary Butyl Ether ("MTBE") Products Liability Litigation

City of New York v. Amerada Hess Corp., et al.

General Questions
Please Print All Answers Legibly

Full Name: _____

Juror Number: _____

1. Date of birth: _____
2. Gender: ___ Male ___ Female
3. Your race or ethnicity: _____
4. City (or neighborhood) where you currently reside

5. Areas, neighborhoods or communities where you have lived in the past 10 years (and dates):

6. With regard to your residence (check all that apply):

_____ House	_____ Apartment
_____ Rent	_____ Own
_____ Live with others and not pay rent	
7. Place of birth: _____
8. Is English your first language? Yes No _____ is my first language
9. What is your marital status?

Single (never married)	Divorced (and not remarried)
Married	Separated
Living with permanent partner	Widowed
10. What is the highest level of education you have completed?

Some high school	College graduate - Bachelor's degree
High School graduate	Some graduate study
Technical or trade school	College graduate - Master's degree
Some college	College graduate - Doctor's degree
College graduate - Associate's degree	Other: _____

11. If you attended college or technical school, what was your major or field of study?

12. Educational background of any other adult who lives in your home, including any degrees or certificates earned:

13. What is your current employment status? (check all that apply)

Working full-time (employer _____)	Disabled
Working part-time (employer _____)	Retired (since _____)
Self-Employed	Unemployed, looking for work (since _____)
Student	Unemployed, not looking (since _____)
Homemaker	Manager

14. If you are currently employed, please list (a) your job title, (b) your employer, (c) how long you have worked for that employer and (d) a brief explanation of your job duties:

15. Please list the last three jobs you have held (begin with current occupation). If retired, disabled, unemployed, or homemaker, please list the last jobs you held outside the home:

Employer	Position/Title	Reason for Leaving	of Time
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

16. How do you feel about your current job (if applicable)?

17. What is (or was) the most recent occupation and employer of your spouse or domestic partner (if applicable)?

18. Have you or someone close to you (including spouses/partners) had any education, training, or work experience in any of the following areas? (Please check only one column for each item.)

a. Oil or gas industry?	____ Yes, me	____ Yes, someone close to me	____ No
b. Chemical industry?	____ Yes, me	____ Yes, someone close to me	____ No
c. Medical?	____ Yes, me	____ Yes, someone close to me	____ No
d. Building/construction?	____ Yes, me	____ Yes, someone close to me	____ No
e. City or state government?	____ Yes, me	____ Yes, someone close to me	____ No
f. Contracts?	____ Yes, me	____ Yes, someone close to me	____ No
g. Statistics?	____ Yes, me	____ Yes, someone close to me	____ No

- h. Urban planning? ☐ Yes, me ☐ Yes, someone close to me ☐ No
 i. Water management? ☐ Yes, me ☐ Yes, someone close to me ☐ No
 j. Environmental engineering? ☐ Yes, me ☐ Yes, someone close to me ☐ No
 k. Government/politics? ☐ Yes, me ☐ Yes, someone close to me ☐ No

Please explain any "YES" answers:

19. Do you hold any professional licenses?

Yes ☐ No ☐

If YES, please describe briefly:

20. Have you ever owned your own business?

Yes ☐ No ☐

If YES, what type of business, and do you still currently own it?

21. Politically, do you consider yourself to be .?

Very conservative
 Conservative
 Moderate

Liberal
 Very liberal
 I have no idea

22. Are you a ☐ Republican ☐ Democrat ☐ Independent

23. What are your hobbies, and/or how do you most often spend your free time?

24. Do you attend religious services on a regular basis (more than once a month)?

Yes ☐ No ☐

25. Have you or a family member ever **sued someone**?

Yes ☐ No ☐

If YES, did that lawsuit involve a claim for money damages? Yes ☐ No ☐

What was the outcome of that lawsuit?

26. Have you or a family member ever **been sued**?

Yes No

If YES, did that lawsuit involve a claim for money damages? Yes No

What was the outcome of that lawsuit?

27. Have you ever served on a jury before? Yes No

If "Yes," did you serve on:

Criminal____ How many? ____

Civil____ How many? ____

Did your jury/juries reach a verdict? Yes No

Did you ever serve as the foreperson? Yes No

28. As far as you can recall, have you ever supported the cause of tort reform (legislation to reduce the number of lawsuits in the courts)? Yes No

29. Do you have any opinions, positive or negative, about oil companies? Yes No

(a) Is that opinion positive or negative? Positive Negative

30. Do you have any opinions, positive or negative, about Exxon Mobil? Yes No

(a) Is that opinion positive or negative? Positive Negative

31. Do you have any opinions, positive or negative, about the Federal Environmental Protection Agency (EPA)? Yes No

(a) Is that opinion positive or negative? Positive Negative

32. Do you have any opinions, positive or negative, about the New York State Department of Environmental Conservation (DEC)? Yes No

(a) Is that opinion positive or negative? Positive Negative

33. Do you have any opinions, positive or negative, about New York City Government? Yes No

(a) Is that opinion positive or negative? Positive Negative

34. Do you believe that oil companies reap exorbitant profits? Yes No

35. Have you heard of the chemical MTBE? Yes No

36. Have you heard of the chemical PCE? Yes No

37. Do you have bottled water delivered to your home? Yes No

38. Do you pay a separate water bill for your home or office? Yes No

39. How often, if at all, do you drink tap water?

40. Do you believe that tap water in your area is safe to drink? Yes No

41. What kind of car do you drive? _____

42. Do you believe there should be more, less or about the same amount of governmental regulation of the environment? (*Check one*) _____ More _____ Less _____ About the same

43. Do you know of any of the following possible witnesses in this trial?

a. _____	Yes	No
b. _____	Yes	No
c. _____	Yes	No
d. _____	Yes	No
e. _____	Yes	No
f. _____	Yes	No
g. _____	Yes	No
h. _____	Yes	No
i. _____	Yes	No
j. _____	Yes	No
k. _____	Yes	No
l. _____	Yes	No
m. _____	Yes	No
n. _____	Yes	No
o. _____	Yes	No
p. _____	Yes	No
q. _____	Yes	No
r. _____	Yes	No

44. If you know any of these possible witnesses, please describe the nature of the relationship, including whether this would prevent you from impartially considering the evidence and reaching a verdict in this case.

45. How would you describe your overall health?

_____ Excellent _____ Good _____ Fair _____ Poor

46. a. Do you or anyone in your immediate family have any serious illnesses or diseases?
Yes No

If YES, please list who and the illnesses or diseases

b. What do you think caused these illnesses or diseases? _____ Heredity _____ Lifestyle
_____ Exposure to toxins or chemicals _____ Other

Please explain _____

47. Do you worry about health risks as a result of where you live? _____ Yes, I worry a little
 _____ Yes, I worry a lot _____ No, I do not worry

If YES, please explain your concerns _____

48. Do you worry about getting cancer? _____ Yes, I worry a little _____ Yes, I worry a lot
 _____ No, I do not worry

ABILITY TO SERVE AS A JUROR

48. Do you or any of your family members or close friends have any connection whatsoever, over and above what you've previously written, to any of the case parties or their lawyers ?

• Exxon Mobil	Yes	No
• City of New York	Yes	No
• The Law Firm of Sher Leff	Yes	No
• The Law Firm of Greenberg Glusker	Yes	No
• The Law Firm of McDermott, Will & Emory	Yes	No

If "Yes" to any of the above, please explain:

49. Do you have any medical or physical limitations that might affect your ability to serve as a juror?
 Yes _____ No _____

If "Yes," please explain:

50. Are you taking any medications regularly? Yes _____ No _____

If "Yes," please explain:

51. Are there any other personal, financial, work-related, emotional, religious or philosophical issues that would be significant distractions to you during the trial? Yes _____ No _____

If "Yes," please explain:

52. Is there any additional information that you feel the Court or the case parties should know before selecting you as a juror? Yes _____ No _____

If "Yes," please explain:

Dated the _____ day of _____, 2009

Please use this space for any additional comments, or to continue answers from prior pages. If continuing your response to a prior question, please be sure to list the question number:

This image shows a single sheet of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.